

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

Dale Wright, Sr., Debtor

Bankruptcy No.: 24-20725-GLT
Chapter 13

Dale Wright, Sr., Debtor

v.

PNC Bank, N.A. and
Ronda L. Winnecour, Chapter 13 Trustee, Respondents

DEBTOR'S DECLARATION REGARDING MORTGAGE PAYMENT CHANGE

AND NOW, come the Debtor/Movant Dale Wright, Sr., by and through his counsel Michael S. Lazaroff, Esquire, and respectfully represent as follows:

1. On December 31, 2024, Respondent PNC Bank filed a *Notice of Mortgage Payment Change* in the above captioned Chapter 13 case.
2. Debtor and undersigned counsel hereby declare that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt because the *Notice* states that the mortgage escrow payment is decreasing due to a decrease in the mortgage interest rate. The existing plan payment is more than enough to cover the new payment.

Respectfully submitted,

/s/ Michael S. Lazaroff

Michael S. Lazaroff, Esquire
PA ID No. 204494

Law Office of Michael S. Lazaroff
277 West Main Street, PO Box 216
Saxonburg, PA 16056-0216
724-352-4905

ButlerDebtLaw@zoominternet.net

Counsel for Debtor